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Renee Baker, Dwayne Baze,  
Tara Carpenter, James G. Cox,  
James Dzurenda and Ronda Larsen*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MARK MANIBUSAN,  
  
Plaintiff,  
  
v.  
  
NEVADA DEPARTMENT OF  
CORRECTIONS, et al.,  
  
Defendants.

Case No. 3:17-cv-00303-MMD-CLB

**STIPULATION TO EXTEND DISPOSITIVE  
MOTION DEADLINE  
(FIRST REQUEST)**

Defendants, Renee Baker, Dwayne Baze, Tara Carpenter, James G. Cox, James Dzurenda and Ronda Larsen, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Stephen J. Avillo, Deputy Attorney General, respectfully submit the following Stipulation and Order to Extend the Dispositive Motion deadline. The parties have previously stipulated to extend the discovery deadline, and this Stipulation is the first request for an extension of only the dispositive motion deadline. This stipulation is entered by the parties in good faith and not for the purpose of delay.

Discovery in this matter concluded September 27, 2021, and dispositive motions are due November 1, 2021. ECF No. 63. Counsel for Plaintiff provided to counsel for Defendants amended initial disclosures on October 22, 2021. This late disclosure was the result of excusable oversight and not for the purpose of delay, and all documents included in the Amended Disclosures had been produced to counsel previously, before the close of discovery.

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1           Additionally, counsel for Defendants is in the process of transitioning to a different position  
2 within the Office of the Attorney General and has spent considerable time in the weeks leading up to  
3 the current deadline on that transition. The current matter is a complex matter by the standards of  
4 inmate litigation, and extending the dispositive motion deadline will allow the parties to fully brief the  
5 issues, utilizing all the discovery provided to date.

6           The parties submit that this stipulation is entered into in good faith and not for the purposes of  
7 delay.

8           Parties therefore stipulate to respectfully request a 30-day extension of the dispositive motion  
9 deadline, to December 1, 2021.

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11           DATED this 28th day of October, 2021.

12 ROBERT L. LANGFORD & ASSOCIATES

AARON D. FORD  
Attorney General

13  
14 By: /s/ Matthew J. Rashbrook  
15 MATTHEW J. RASHBROOK, ESQ.  
16 Nevada Bar No. 12477  
*Attorneys for Plaintiff*

By: /s/ Stephen J. Avillo  
STEPHEN J. AVILLO, ESQ.  
Nevada Bar No. 11132  
*Attorneys for the NDOC Defendants*

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18 IT IS SO ORDERED.

19 Dated: November 2, 2021

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22 UNITED STATES MAGISTRATE JUDGE  
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**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 1st day of November, 2021, I caused to be served a copy of the foregoing, **STIPULATION TO EXTEND DISPOSITIVE MOTION DEADLINE (FIRST REQUEST)**, by U.S. District Court

CM/ECF Electronic Filing to:

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/s/ Roberta W. Bibee  
An employee of the Office  
of the Attorney General